

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

PEDRO RAMIREZ, JR., Individually and on §  
Behalf of All Others Similarly Situated, §  
§  
*Plaintiff,* §  
§  
v. §  
§ Civil Action No. 3:16-CV-3111-L  
EXXON MOBIL COPORATION, REX W. §  
TILLERSON, ANDREW P. SWIGER, and §  
JEFFERY J. WOODBURY, §  
§  
*Defendants.* §

**DEFENDANTS' JOINDER IN NOTICE OF RELATED CASE**

Subject to and without waiving any of their defenses, Defendants hereby join Plaintiff's Notice of Related Case, filed November 7, 2016. *See D.E. 2.*

Pursuant to Local Rule 3.3(b)(3) of the Northern District of Texas, a "related case" is defined as "any civil action" that "arises from a common nucleus of operative fact with the case being filed or removed." Defendants agree with Plaintiffs that this lawsuit is related to *Exxon Mobil Corporation v. Maura Tracy Healy*, Civil Action No. 4:16-CV-00469-K, which is currently pending before the Honorable Ed Kinkeade. Both lawsuits assert claims based on the conduct of Exxon Mobil Corporation and allegations relating to global warming and climate change. Accordingly, Defendants join Plaintiff's Notice of Related Case and respectfully request that this case be reassigned to Judge Kinkeade.

Respectfully Submitted,

/s/ Theodore V. Wells, Jr.

Theodore V. Wells, Jr.

*pro hac vice* forthcoming

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**CERTIFICATE OF SERVICE**

This is to certify that on this 9<sup>th</sup> day of November 2016, a true and correct copy of the foregoing document was filed electronically via the CM/ECF system, which gave notice to all counsel of record pursuant to Local Rule 5.1(d).

/s/ Nina Cortell

Nina Cortell